

[Parties and Counsel Listed on Signature Pages]

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR-PHK

4:23-cv-05448-YGR

**META AND NEW YORK'S STIPULATION
AND [PROPOSED] ORDER EXTENDING
DEADLINE TO COMPLETE THE RULE
30(b)(6) DEPOSITION OF THE STATE OF
NEW YORK**

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff State of New York (the “State”) and Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (collectively, “Meta,” and together with the State, the “Parties”), through their undersigned counsel, hereby stipulate as follows:

1. Under the schedule ordered by Magistrate Judge Kang on July 2, 2025, the current deadline for Meta to complete its fact and Rule 30(b)(6) deposition of New York witnesses is August 29, 2025. *See* ECF 2091.

2. Since at least May 21, 2025, Meta and certain non-party State Executive Agencies¹ have discussed a dispute over whether those agencies must complete their review of approximately 633,000 unreviewed documents to comply with their document discovery agreements. On August 11, 2025, this Court granted Meta’s Administrative Motion to Compel Joint Letter Briefing by those Executive Agencies (“August 11 Order”). ECF 2176. Pursuant to the August 11 Order, Meta and those Executive Agencies submitted their Joint Letter Brief regarding their dispute on August 15, 2025 (“August 15 Joint Letter Brief”). ECF 2187.

3. Following the August 11 Order, the Parties agreed that it would be most efficient to postpone Meta’s Rule 30(b)(6) deposition of New York until after the Court has ruled on the August 15 Joint Letter Brief.

4. Pending resolution of the August 15 Joint Letter Brief, the Parties have agreed to extend Meta’s deadline for completing its Rule 30(b)(6) deposition of New York on the following terms:

- a. Subject to the Court’s approval, Meta’s deadline to complete its Rule 30(b)(6) deposition of New York shall be extended to a time no earlier than four (4) weeks and no later than six (6) weeks following substantial completion of any document production made in connection with the August 15 Joint Letter Brief; or no earlier than three (3) weeks and no later than five (5) weeks from the date of the Court’s order resolving the August 15 Joint Letter Brief if the Court does not order any

¹ New York Council on Children and Families (“CCF”), Department of Health (“DOH”), Office of Children and Family Services (“OCFS”), Office of Mental Health (“OMH”), and Office of the Governor (the “Executive Chamber”).

1 further document review (including without limitation any privilege review),
2 document production, or conferrals. The Parties further agree to work together in
3 good faith and seek any further extensions from this Court as needed, including to
4 accommodate the schedules of counsel and any Rule 30(b)(6) designee(s) of New
5 York.

6 b. The State reserves all rights related to the Rule 30(b)(6) deposition of New York.
7 This agreement does not constitute a waiver of any objections the State has or
8 may raise with respect to this deposition, nor does it alter any requirements or
9 limitations imposed on this deposition by previous court orders, aside from the
10 deadline for completion of such deposition.

11 c. Meta reserves all rights related to the Rule 30(b)(6) deposition of New York,
12 including without limitation the right to dispute any objections that the State may
13 raise.

14 d. Meta further reserves all rights to seek any further relief in light of any court order
15 resolving the August 15 Joint Letter Brief, and the State likewise further reserves
16 all rights to oppose any such relief sought by Meta.

17 5. This Court has previously extended Meta's deadline to complete fact and Rule 30(b)(6)
18 depositions of State witnesses twice. *See* ECF 1696, 2091. This stipulated extension of the deadline for
19 Meta to complete the Rule 30(b)(6) deposition of New York does not and will not affect any other
20 deadlines already set or that may be set in this action, nor the deposition time limits already set in ECF
21 1696, nor does it affect any party's or non-party's rights in relation to any other deadlines.

Respectfully submitted,

DATED: August 28, 2025

COVINGTON & BURLING LLP

By: /s/ Ashley M. Simonsen

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ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: August 28, 2025

By: /s/ Ashley M. Simonsen
Ashley M. Simonsen

[PROPOSED] ORDER

By agreement of the Parties, and for good cause shown, **IT IS SO ORDERED.**

Dated: _____, 2025

Magistrate Judge Hon. Peter H. Kang